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October 24, 2003

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Marlene H Dortch, Esquire
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C 20554

Attention Audio Division, Media Bureau

Re: MM Docket 03-192
RM-10763
Amendment of FM Table of Allotments
Brazil and Spencer, Indiana

Dear Ms. Dortch

Transmitted herewith are an original and four copies of "Joint Comments," submitted by Crossroads Investments, LLC, licensee of WSDM-FM, Brazil, Indiana, and Mid-America Radio of Indiana, Inc, licensee of WSKT(FM), Spencer, Indiana, in the above-referenced proceeding.

Should any questions arise concerning this matter, please communicate with this office.

Very truly yours,


Anne Goodwin Crump
Counsel for Mid-America Radio of Indiana, Inc.

Enclosure

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Before the Federal Communications Commission
Washington, D.C. 20554

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OCT 24 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Section 73.202(b),)	MM Docket No. 03-192
Table of Allotments,)	RM-10763
FM Broadcast Stations.)	
(Brazil and Spencer, Indiana))	

Directed to. Chief, Media Bureau

JOINT COMMENTS

Crossroads Investments, LLC ("Crossroads"), licensee of WSDM-FM, Brazil, Indiana, and Mid-America Radio of Indiana ("Mid-America"), licensee of WSKT(FM), Spencer, Indiana, (together, "Joint Petitioners"), hereby respectfully submit their Joint Comments in support of the Commission's *Notice of Proposed Rule Making*, DA 03-2753, released September 5, 2003, which proposes to amend Section 73.202(b) of the Commission's Rules, the FM Table of Allotments, to substitute Channel 224A for Channel 249A at Brazil, Indiana, and modify the license for WSDM-FM accordingly, and to substitute Channel 249A for Channel 224A at Spencer, Indiana, and to modify the license for WSKT(FM) accordingly. With respect thereto, the following is stated:

1 In essence, the proposed modifications would exchange the channels on which Joint Petitioners' respective stations operate. As set forth in the engineering statement attached to the Joint Petition for Rule Making in the instant proceeding, the proposed modified allotments are in compliance with the Commission's technical rules and policies. Further, the proposed substitutions represent an "incompatible channel swap" in accordance with the Commission's

policies related to Section 1.420(g)(3) of the Commission's Rules

2. This proposed channel exchange will provide clear public interest benefits. First, the change in channels will eliminate a grandfathered, short-spaced allotment. At the present time, WSKT(FM) is short-spaced to both WTTS(FM), Bloomington, Indiana, and WJCP(FM), Austin, Indiana. The proposed change from Channel 224A to Channel 249A will eliminate those short-spacings.

3. Second, the channel change will allow WSKT(FM) to improve its facilities and to expand substantially the area and nearly double the population which it can serve. WSKT(FM) currently is forced to operate with only limited facilities. The station's current license authorizes it to operate with only 1.0 kW, at a height above average terrain ("HAAT") of 146 meters. As set forth in the attached engineering statement, this combination represents less than the equivalent of 3.0 kW at an HAAT of 100 meters. The channel change, however, will allow WSKT(FM) to operate with the equivalent of the Class A maximum power of 6.0 kW with an HAAT of 100 meters.

4. This increase in power will allow WSKT(FM) to serve a substantially greater area and population. Currently, the WSKT(FM) predicted 60 dBu contour encompasses an area of 1,606.31 square kilometers and a population of 35,410 persons. See Exhibit 1. Upon increasing its effective radiated power to the equivalent of the class maximum, however, WSKT(FM)'s predicted 60 dBu contour will cover 2,610.62 square kilometers and will serve 70,163 persons. This represents a 62.5 percent increase in area covered and a 98.1 percent increase in population served.

5. Clearly, therefore, the proposed channel exchange would serve the public interest by

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providing for both the elimination of a short-spaced allotment and a substantial increase in service to the public. If the channel changes requested herein are adopted by the Commission, Crossroads and Mid-America will each promptly file applications seeking authorizations to implement the changes. In addition, upon authorization of the channel changes, Crossroads and Mid-America each will promptly undertake any and all construction or other station modifications necessary to implement the proposed changes.

WHEREFORE, the premises considered, Crossroads and Mid-America hereby respectfully request that Channel 224A be substituted for Channel 249A at Brazil, Indiana, and the license for WSDM-FM be modified accordingly, and that Channel 249A be substituted for Channel 224A at Spencer, Indiana, and the license for WSKT(FM) be modified accordingly. In addition, by signature of its officer below, Crossroads hereby verifies under penalty of perjury that its foregoing statements are true and correct to the best of its knowledge and belief.

Respectfully submitted,

CROSSROADS INVESTMENTS, LLC

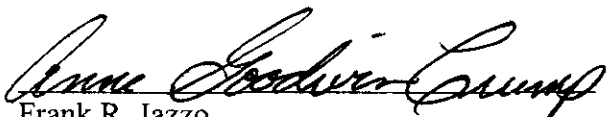
By:



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MID-AMERICA RADIO OF INDIANA, INC.

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